

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

*IN RE: DEVA CONCEPTS PRODUCTS
LIABILITY LITIGATION*

Master File No. 1:20-cv-01234-GHW

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**PLAINTIFFS' NOTICE OF MOTION FOR APPOINTMENT OF
INTERIM LEAD COUNSEL, INTERIM LIAISON COUNSEL, AND
INTERIM EXECUTIVE COMMITTEE PURSUANT TO FED. R. CIV. P. 23(g)(3)**

PLEASE TAKE NOTICE that Plaintiffs hereby move the Court, before the Honorable Gregory H. Woods, at the United States Courthouse, 500 Pearl Street, New York, New York, pursuant to Rule 23(g)(3) of the Federal Rules of Civil Procedure, for an Order designating Gary E. Mason (Mason Lietz & Klinger LLP), Gary M. Klinger (Mason Lietz & Klinger LLP), Charles Schaffer (Levin Sedran & Berman LLP), and Rachel Soffin (Greg Coleman Law) as Interim Co-Lead Counsel; Gary Graifman (Kantrowitz Goldhamer & Graifman, P.C.) as Interim Liaison Counsel; and Melissa R. Emert (Stull, Stull & Brody), Jeffrey Goldenberg (Goldenberg Schneider, L.P.A.), John Macoretta (Spector Roseman & Kodroff, P.C.), Joel Rhine (Rhine Law Firm), Gordon Rudd (Zimmerman Reed LLP), Robert S. Schachter (Zwerling, Schachter & Zwerling), Jonathon Shub (Shub Law Firm, LLC), and Melissa Weiner (Pearson, Simon & Warshaw, LLP) as Interim Executive Committee members, and for such other and further relief as the Court deems just and proper.

Plaintiffs submit the accompanying Memorandum of Law in Support of Plaintiffs' Motion and the Declaration of Gary S. Graifman with Exhibits ("Graifman Decl."), filed separately for the

Court's consideration.¹ A proposed Order granting this Motion is attached as Exhibit 13 to the Graifman Decl.

Dated June 12, 2020

Respectfully submitted,

s/ Gary S. Graifman

Gary S. Graifman

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¹ This Motion for Appointment of Interim Lead Counsel does not require a pre-motion letter pursuant to the Court's individual rules. *See* Judge Woods' Individual Rules of Practice in Civil Case, Rule 2(c).

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